1 2 3 4 5 6 7 8 9	JASON M. FRIERSON United States Attorney Nevada Bar No. 7709 CHRISTOPHER D. VIEIRA, CABN 273781 Special Assistant United States Attorney 6401 Security Boulevard Baltimore, MD 21235 Telephone: (510) 970-4808 Facsimile: (415) 744-0134 E-Mail: christopher.vieira@ssa.gov Attorneys for Defendant	
10	IINITED STAT	TES DISTRICT COURT
11	DISTRICT OF NEVADA	
112   113   114   115   116   117   118   119   119   120   121   122   122   123   124   125   126   126   126   126   126   127	GLENN MARSHALL PITTS, JR.,  Plaintiff,  vs.  KILOLO KIJAKAZI, Acting Commissioner of Social Security,  Defendant.	Case No.: 2:22-cv-01713-EJY  UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION FOR REVERSAL AND/OR REMAND  (FIRST REQUEST)

Defendant Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or Remand (Dkt. No. 16), currently due on March 13, 2023, by 30 days, through and including April 12, 2023. Defendant further requests that all subsequent deadlines set forth in the Court's scheduling order (Dkt. No. 13) be extended accordingly.

This is Defendant's first request for an extension of time to respond to Plaintiff's Motion for Reversal and/or Remand. Good cause exists for this extension. This case was reassigned to undersigned counsel on March 8, 2023, due to high workloads in Defendant's counsel's office. Additional time is required to review the record, to evaluate the issues raised in Plaintiff's motion, to determine whether options exist for settlement, and if not, to prepare Defendant's response to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as possible. This request is made in good faith and with no intention to unduly delay the proceedings, and counsel apologizes for any inconvenience.

On March 8, 2023, counsel for Defendant conferred with Plaintiff's attorney, who has no opposition to this motion.

It is therefore respectfully requested that Defendant be granted an extension of time to respond to Plaintiff's Motion for Reversal and Remand, through and including April 12, 2023.

Dated: March 8, 2023

JASON M. FRIERSON United States Attorney

/s/ Christopher Vieira CHRISTOPHER D. VIEIRA Special Assistant United States Attorney Attorneys for Defendant

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: March 9, 2023

Mot. for Ext.; No 2:22-cv-01713-EJY